

APPENDIX A - PROPOSED SCHEDULE

Deadline	Date	Explanation
Deadline to file motion to dismiss	12/15/2023	
Deadline to file opposition to MTD	1/15/2024	Complex case, so more than 14 days after motion to dismiss (EDTX Local Rule 7(e))
Deadline to file reply in support of MTD	1/31/2024	Complex case so more than 7 days after motion (EDTX Local Rule 7(f))
Close of Fact Discovery	6/28/2024	MDL Deadline from PTO 5 (Dkt. 394)
Plaintiffs' Expert Reports Due	7/12/2024	2 weeks after close of fact discovery; same period as this Court's 2021 Scheduling Order
Google's Expert Reports Due	8/30/2024	7 weeks after opening expert reports; same period as this Court's 2021 Scheduling Order
Plaintiffs' Rebuttal Expert Reports Due	9/27/2024	4 weeks after Google's expert reports; same period as this Court's 2021 Scheduling Order
Close of Expert Discovery	11/8/2024	6 weeks after rebuttal expert reports; same period as this Court's 2021 Scheduling Order
Deadline to file summary judgment motions	12/13/2024	5 weeks after close of expert discovery; same period as this Court's 2021 Scheduling Order
Deadline to file Daubert motions	12/13/2024	5 weeks after close of expert discovery; same period as this Court's 2021 Scheduling Order
Deadline for oppositions to summary judgment and Daubert motions	1/3/2025	3 weeks after opening summary judgment & Daubert motions; same period as this Court's 2021 Scheduling Order
Deadline for replies to summary judgment and Daubert motions	1/17/2025	2 weeks after oppositions to summary judgment & Daubert motions; same period as this Court's 2021 Scheduling Order
Deadline for counsel to contact opposing counsel to determine how they will prepare the joint final pretrial order and jury instructions/verdict form (or proposed findings of fact and conclusions of law)	4/11/2025	12 weeks after replies in support of summary judgment & Daubert motions; same period as this Court's 2021 Scheduling Order